UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

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| In re JP MORGAN CHASE & CO. | : | |
| DERIVATIVE LITIGATION | ; ; ; | Lead Case No. 1:12-cv-03878-GBD (Derivative Action) |
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NOTICE OF DEFENDANTS' MOTION TO DISMISS OR, <u>IN THE ALTERNATIVE, STAY THIS ACTION</u>

PLEASE TAKE NOTICE THAT upon the accompanying memorandum of law, the Declaration of Christopher M. Viapiano, executed June 24, 2013, and the exhibits attached thereto, defendants James A. Bell, Crandall C. Bowles, Stephen B. Burke, David M. Cote, James S. Crown, Ellen V. Futter, William H. Gray, III, Laban P. Jackson, Jr., David C. Novak, Lee R. Raymond, William C. Weldon, James S. Dimon, Douglas L. Braunstein, John Hogan, Barry Zubrow and Ina Drew and nominal defendant JPMorgan Chase & Co., by their undersigned counsel, will move this Court, before the Honorable George B. Daniels, United States District Judge, at the Daniel Patrick Moynihan United States Courthouse, 500 Pearl Street, New York, New York, on a date and time to be set by the Court, for an Order dismissing this shareholder derivative action with prejudice pursuant to Federal Rule of Civil Procedure 23.1 and Delaware Court of Chancery Rule 23.1 or, in the alternative, staying this action pending resolution of a closely related securities class action pending before this Court, and granting such other and further relief as the Court may deem just and proper.

Dated: June 24, 2013

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Attorneys for defendants James S. Dimon, Douglas L. Braunstein, John Hogan, Barry Zubrow and Ina Drew and nominal defendant JPMorgan Chase & Co.

CERTIFICATE OF SERVICE

I, Christopher M. Viapiano, hereby certify that copies of:

the Notice of Defendants' Motion to Dismiss or, In the Alternative, Stay this Action;

Defendants' Memorandum of Law in Support of Their Motion to Dismiss or, In the Alternative, Stay this Action; and

the Declaration of Christopher M. Viapiano in Further Support of Defendants' Motion to Dismiss or, In the Alternative, Stay this Action and the exhibits thereto

were filed with the Court's ECF system, which will send copies electronically to all counsel that have appeared in this action and registered with such system.

Dated: Washington, D.C. June 24, 2013

s/ Christopher M. Viapiano Christopher M. Viapiano